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REGULATORY AUTH.

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OFFICE OF THE  
EXECUTIVE SECRETARY  
7001 N. Scottsdale Rd. Suite 2000  
Scottsdale, AZ 85250  
Phone: 602-367-8000  
Fax: 602-367-8008

February 13, 2001

VIA UNITED STATES POSTAL SERVICE

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**Re: Docket No. 99-00837**  
**Application of Compass Telecommunications, Inc. for a Certificate to Provide**  
**Facilities-Based Interexchange Telecommunications Services and Competitive Local**  
**Exchange Telecommunications Services**

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen (13) copies of the responses of Compass Telecommunications, Inc. ("Compass") to staff's May 12, 2000 data request pursuant to Docket No. 99-00837 in the above entitled proceeding.

Any questions pertaining to this filing may be directed to my attention at (480) 483-1068.

Sincerely,

A handwritten signature in cursive script that reads "Terri McLeod".

Terri McLeod  
Legal & Regulatory

**Cc: Jim Hirschy**

RESPONSES OF COMPASS TELECOMMUNICATIONS, INC.  
TO STAFF'S DATA REQUEST  
DATED MAY 12, 2000  
99-00837

1

Numbering Issues

- Question 1: What is your company's expected demand for NXXs per NPA within a year of approval of your application?
- Response: Compass Telecommunications, Inc. ("Compass") does not plan to request an NXX for any of Tennessee NPA's within the first year. Initially will resell Bellsouth services until a customer base is established.
- Question 2: How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?
- Response: One block of 10,000 in the 615 NPA and upon further network and customer build out then one block of 10,000 in the 901 NPA
- Question 3: When and in what NPA do you expect to establish your service footprint?
- Response: Nashville 615, 931 and Memphis 901 by June 2002.
- Question 4: Will the company sequentially assign telephone numbers within NXXs?
- Response: Yes as a general rule unless a customer requests the selection on non-sequential numbers, Compass will evaluate the request on a case-by-case basis.
- Question 5: What measures does the company intend to take to conserve Tennessee numbering resources?
- Response: Compass will use the known means of number conservation by
- a. Local Number Portability (LNP). Compass projects that service provided initially through resell will create a customer base that will be keeping their previously assigned number. The effect of LNP will be appreciable in this context by reducing the need to release new numbers to service the existing population of customers.
  - b. Advanced Inventory Management Systems. Compass will return telephone numbers to the internal inventory management system after actual customer disconnections and 60 days of playing the number change announcement. These numbers then will be immediately available for reuse.
  - c. Number Pooling. Compass will support number pooling where available.

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2

Numbering Issues continued

Question 6: When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

Response: The percentage of fill used will depend on the rate of exhaustion and the current lead time for assignment of a new NXX. At the outset Compass expects to use an 80% fill factor.

Tennessee Specific Operational Issues

Question 1: How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.

Response: Compass will follow industry standard guidelines in complying with the toll-free countywide requirement in TCA §65-21-114. Specifically, Compass is developing an internal Operational Support System (OSS) that will measure all basic and local toll free calls by length of call, time of day call is placed, and the distance of the call. This data will be collected and compiled along with the call detail record (CDR) and the data in the pre-loaded database containing Tennessee Countywide Calling information of NXX pairs for which no toll charge will be applied.

Question 2: Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers on the database?

Response: Compass has become aware of the TCWC database and has an interconnection agreement with BellSouth, pending the Tennessee authority, and will coordinate with BellSouth to obtain access. Once granted, Compass will electronically load the data into its Operational Support Systems (OSS), including its internal billing systems. Compass will continue to update its databases to remain compliant.

February 13, 2001

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3

Tennessee Specific Operational Issues continued

Question 3: How does your company intend to provide metro area toll-free calling ("MAC") around Memphis, Nashville, Knoxville and Chattanooga?

Response: Compass plans on offering this service in both Nashville and Memphis in a similar fashion as the BellSouth Area Plus service and Business Plus Service Plans. The local calling area will include the existing basic local calling area and expanded local calling area within the single LATA boundary. There will be 10-digit calling to the expanded area within a LATA and 1+10 digit calling to the expanded area for calls crossing LATAs.

Question 4: Is the company aware of the MAC database maintained by BellSouth and the procedures to enter your telephone numbers on the database?

Response: Compass has become aware of the MAC database and will establish interconnection agreement with BellSouth, pending the Tennessee authority, to coordinate with BellSouth and obtain access. Once granted, Compass will electronically load the data into its Operational Support Systems (OSS), including its internal billing systems. Compass will continue to update its databases to remain compliant.

Question 5: Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.

Response: Becky Thacker, Business Office Manager  
(800) 741-5104  
(480) 367-1010  
Compass Telecommunications, Inc.  
7001 North Scottsdale Road, Suite 2000  
Scottsdale, Arizona 85253

Question 6: Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA§65-4-401 *et seq.* And Chapter 1220-4-11?

Response: Compass does not have plans to telemarket its services in Tennessee but it may chose to in the future. The Company is aware of various regulatory requirements concerning telemarketing practices including those mentioned and will comply with all such requirements.

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4

Financial Requirements:

Statement: F. TCA §65-4-125 amendment states that by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to Tennessee Code Annotated, §65-4-301(b), or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million (\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20, 000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the authority.

Response: Compass will comply with this and all other legal requirements.

February 13, 2001

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